

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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	:	
In re:	:	Chapter 11
	:	
FTX TRADING LTD., <i>et al.</i> , ¹	:	Case No. 22-11068 (JTD)
	:	
Debtors.	:	(Jointly Administered)
	:	
	X	

**FOURTH SUPPLEMENTAL DECLARATION OF THOMAS M. SHEA ON BEHALF
OF ERNST & YOUNG LLP**

I, Thomas M. Shea, hereby declare pursuant to Rule 2014(a) of the Bankruptcy Rules² as follows:

1. I am a Principal of EY US LLP. I provide this fourth supplemental declaration (the “Fourth Supplemental Declaration”) on behalf of EY LLP. This Fourth Supplemental Declaration supplements my original declaration that was filed with this Court on December 21, 2022 [Docket Nos. 284-285, 298, 300, 500-1] (the “Initial Declaration”), my first supplemental declaration that was filed with this Court on January 16, 2023 [Docket No. 499] (the “First Supplemental Declaration”), my second supplemental declaration that was filed with this Court on April 11, 2023 [Docket No. 1263] (the “Second Supplemental Declaration”), and my third supplemental declaration that was filed with this Court on January 3, 2024 [Docket No. 5320] (the “Third Supplemental Declaration” and, together with the Initial Declaration, First Supplemental

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Previous Declarations.

Declaration, and Second Supplemental Declaration, the “Previous Declarations”).

2. The facts set forth in this Fourth Supplemental Declaration are based upon my personal knowledge, upon information and belief, upon client matter records kept in the ordinary course of business that were reviewed by me or professionals of EY LLP and EY US LLP or employees of other member firms of EYGL under my supervision and direction.

3. On January 19, 2024, Debtor’s counsel provided EY LLP with an updated Parties in Interest list. Consistent with the process described in the Initial Declaration, EY LLP caused the names of the Parties in Interest who were not included in Exhibit B to my Initial Declaration or who were marked as “no connection” in Exhibit B to my Initial Declaration to be run through the Database. The disclosure schedule annexed hereto as **Schedule 1** lists the names of such Parties in Interest and whether they are currently engaging, or have engaged during the last three years, EY LLP or any other EYGL member firm. All Parties in Interest for which a “connection” was marked in Exhibit B to my Initial Declaration continued to have a “connection” marked in Schedule 1 to this Fourth Supplemental Declaration.³

4. To the best of my knowledge, information and belief based on the information set forth in the Database, except as otherwise stated in the Previous Declarations, none of the services rendered to Parties in Interest by EY LLP or any other EYGL member firm have been in connection with the Debtors or these chapter 11 cases.

5. In addition to the Party-Retained Professionals listed in paragraph 26 of the Initial Declaration, the following Party-Retained Professionals have been identified as Parties in Interest

³ To date, fifteen EYGL member firms have submitted subcontractor declarations in these chapter 11 cases [Docket Nos. 1327, 1328, 1429, 1330, 1428, 1430, 1431, 1432, 1535, 1578, 2141, 2507, 3680, 4114, and 6739]. My expectation is that these EYGL member firms will not submit supplemental declarations of disinterestedness concerning the updated Parties in Interest list that EY LLP received on January 19, 2024, as those EYGL member firms have access to the same Database that EY LLP caused to be reviewed for engagements of Parties in Interest by all EYGL member firms.

that have provided in the past three years and/or are currently providing services to EY LLP: Baker McKenzie, Binder Grösswang, Debevoise & Plimpton LLP, Grant Thornton, Groom Law Group, Joele Frank, Kramer Levin Naftalis & Frankel LLP, Simpson Thacher & Bartlett LLP, and Sullivan & Cromwell LLP.

6. Due to a typographical error, paragraph 38 of my Initial Declaration inadvertently stated that “JPMorgan C” participated in EY LLP and EY US LLP’s Revolving Credit Program. “JPMorgan C” should have read “JPMorgan Chase, N.A.”

7. On April 19, 2024, the Court entered its Order Authorizing and Approving the (I) Dismissal of the Chapter 11 Cases of the Foreign Wind Down Entities and (II) Equitization of Release of Certain Intercompany Claims and Making Related Capital Contributions [Docket No. 12260] (the “Dismissal Order”). EY LLP will continue to provide services related to the Foreign Wind Down Entities to the Debtors in their capacity as shareholders of the Foreign Wind Down Entities.

8. To the best of my knowledge, EY LLP (a) continues not to hold or represent an interest adverse to the Debtors’ estates, and (b) is and remains a “disinterested person,” as such term is defined in section 101(14) of the Bankruptcy Code, as required under section 327(a) of the Bankruptcy Code. Moreover, to the best of my knowledge, information and belief, EY LLP’s retention is not prohibited or restricted by Bankruptcy Rule 5002.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: May 31, 2024

/s/ Thomas M. Shea
Thomas M. Shea